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FEDERAL COMMUNICATIONS COMMISSION  
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4 September 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20555

Subject: EX PARTE PRESENTATION  
CC Docket No. 92-237

Dear Mr. Caton:

The purpose of this ex parte presentation is to respond to and provide additional information not included in the 14 August 1997 ex parte presentation filed by Lockheed Martin IMS.

*Innovative Technology  
in the Public Interest*

In that ex parte presentation, Lockheed Martin IMS "unconditionally commits to be fully compliant with the NANPA [North American Numbering Plan Administrator] neutrality requirements during [a] five-year NANPA term."<sup>1</sup> With respect to neutrality, the NANPA may not be a telecommunications service provider or an affiliate of a telecommunications service provider,<sup>2</sup> as defined in the Telecommunications Act of 1996. Lockheed Martin IMS, who has offered a proposal to be the NANPA entity, is a wholly owned subsidiary,<sup>3</sup> and hence an affiliate as defined in the Telecommunications Act of 1996, of Lockheed Martin Corporation. Lockheed Martin Corporation and its affiliates, as defined in the Telecommunications Act of 1996, currently offer and have received FCC licenses to provide telecommunications services.

Attachment 1 presents the relationships between Lockheed Martin Corporation, Lockheed Martin IMS, and the affiliates known as Lockheed Martin Telecommunications, Lockheed Martin Intersputnik, Loral Space and Communications, and Globalstar. Attachment 2 enumerates the

<sup>1</sup> Ganek, Jeffery, Lockheed Martin IMS, ex parte presentation to Mr. William F. Caton, Federal Communications Commission, 14 August 1997

<sup>2</sup> North American Numbering Council, *Requirements Document*, 20 February 1997

<sup>3</sup> Lockheed Martin Response to the North American Numbering Council, 2 May 1997, Redacted Version, page RI-11

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telecommunications services currently provided or to be provided within the first five-year NANPA term by Lockheed Martin Corporation and the affiliates.

In the NANPA Report and Order,<sup>4</sup> the Commission clearly stated its reasons for changing the current model for North American Numbering Plan Administration and the importance for neutrality and impartiality in the NANPA:

- “[C]hanges in the structure of the telecommunications market make it appropriate to shift administrative responsibilities for all domestic numbering matters to a neutral entity.”
- “Eliminating the potential for discriminatory treatment that exists under the current system is a major purpose behind the decision to adopt the new model for administering numbering resources.”

Given the importance that the Commission has given the neutrality of the new NANPA, it is only appropriate that the Commission specifically determine whether or not Lockheed Martin Corporation and affiliates are telecommunications service providers. This determination will be key to the selection of a new NANPA who is to provide neutral and non-discriminatory treatment of all telecommunications service providers requiring access to the number resources.

Sincerely,



H. Gilbert Miller

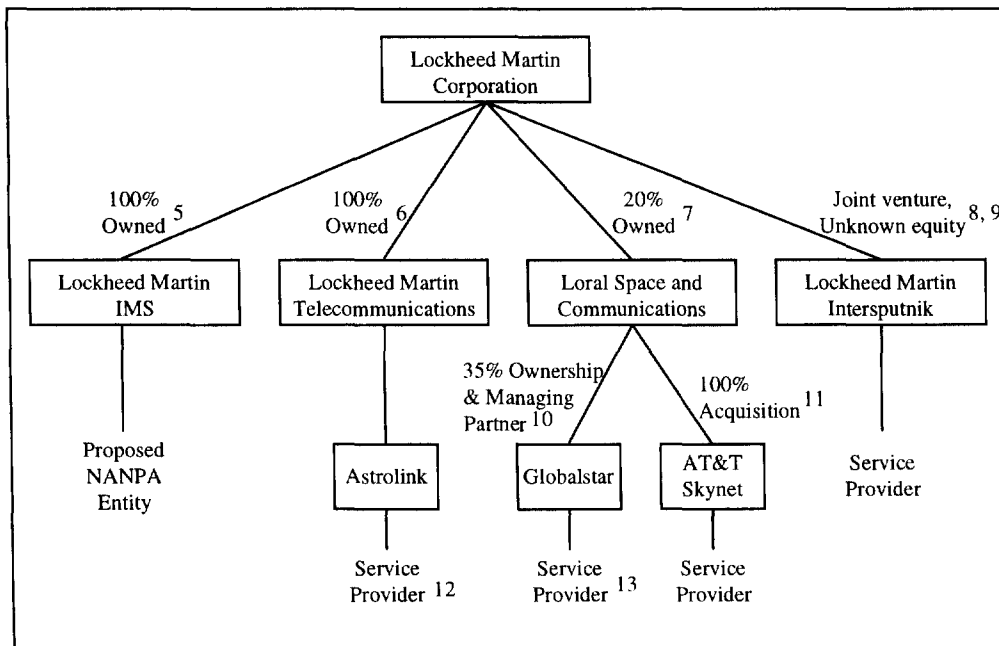
cc: Chairman Hundt  
Commissioner Chong  
Commissioner Ness  
Commissioner Quello  
Erin Duffy  
Marian Gordon  
Kathleen Levitz  
Geraldine Matise

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<sup>4</sup> *Administration of the North American Numbering Plan*, Report and Order, FCC Docket No. 92-237, 13 July 1995

**Attachment 1**

**Lockheed Martin Corporation Operating Units and Affiliates  
That Provide Telecommunications Services**



<sup>5</sup> Lockheed Martin Response to the North American Numbering Council, 2 May 1997, Redacted Version, page RI-11

<sup>6</sup> Lockheed Martin, Business Unit Headquarters, 30 June 1997, <http://www.lmco.com/oview/9704/bu-hq.html#Space> Strategic Missiles Sector

<sup>7</sup> Lockheed Martin, Press Release, 23 April 1996, <http://www.lmco.com/press-releases/pr042396.html>

<sup>8</sup> Lockheed Martin, *Lockheed Martin Today*, 8 July 1997, <http://www.lmco.com/files2/lmtoday/9706/russian.html>

<sup>9</sup> Lockheed Martin, Press Release, 2 June 1997, <http://www.shareholder.com/lmt/news/060297g.htm>

<sup>10</sup> Internet Press Release, <http://www.inetbiz.com/ssloral/PR970224.html>

<sup>11</sup> Internet Press Release, <http://www.inetbiz.com/ssloral/PR970314.html>

<sup>12</sup> Federal Communications Commission, *In the Matter of Lockheed Martin Corporation Application for Authority to Construct, Launch, and Operate a Ka-Band Satellite System in the Fixed-Satellite Service*, File Nos. 182 through 186-SAT-P/LA-95, 8 May 1997

<sup>13</sup> Globalstar, *System Description*, <http://www.globalstar.com/>

**Attachment 2**

**Telecommunications Services Provided by  
Lockheed Martin Corporation Operating Units and Affiliates**

**Lockheed Martin Telecommunications (Astrolink)**

- Advanced broadband communications services to business and consumers around the world<sup>14</sup>
- Lockheed proposes to offer services such as global Internet services, video teleconferencing, distance learning, telemedicine, high-speed data networks, and “bandwidth on demand”<sup>15</sup>

**Loral Space and Communications**

- Distribution of entertainment and educational programming<sup>16</sup>
- Customers include AT&T, EchoStar, ABC, AlphaStar DBS<sup>17</sup>

**Globalstar**

- Wireless telecommunications systems to provide voice, data, fax, and other telecommunications services to users world wide,<sup>18</sup> including access to the U.S. domestic telecommunications market<sup>19</sup>

**Lockheed Martin Intersputnik**

- Broadcast, fixed telecommunications<sup>20</sup>
- Direct-to-home video and audio, mobile services to customers worldwide<sup>21</sup>

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<sup>14</sup> Federal Communications Commission, *In the Matter of Lockheed Martin Corporation Application for Authority to Construct, Launch, and Operate a Ka-Band Satellite System in the Fixed-Satellite Service*, File Nos. 182 through 186-SAT-P/LA-95, 8 May 1997

<sup>15</sup> Federal Communications Commission, *In the Matter of Lockheed Martin Corporation Application for Authority to Construct, Launch, and Operate a Ka-Band Satellite System in the Fixed-Satellite Service*, File Nos. 182 through 186-SAT-P/LA-95, 8 May 1997

<sup>16</sup> Internet Press Release, <http://www.inetbiz.com/ssloral/PR970314.html>

<sup>17</sup> Internet Press Release, <http://www.inetbiz.com/ssloral/PR970314.html>

<sup>18</sup> Globalstar, <http://www.globalstar.com/system/index.htm>

<sup>19</sup> Internet Press Release, <http://www.inetbiz.com/ssloral/PR-GstarFCCauth.html>

<sup>20</sup> Lockheed Martin, *Lockheed Martin Today*, 8 July 1997, <http://www.lmco.com/files2/lmtoday/9706/russian.html>

<sup>21</sup> Lockheed Martin, *Lockheed Martin Today*, 8 July 1997, <http://www.lmco.com/files2/lmtoday/9706/russian.html>